

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>IN RE:</p> <p>STREAM TV NETWORKS, INC.,</p> <p style="text-align: center;">Debtor,</p> <p>IN RE:</p> <p>TECHNOVATIVE MEDIA, INC.,</p> <p style="text-align: center;">Debtor.</p>	<p>CHAPTER 11</p> <p>CASE NO.: 23-10763 MDC</p> <p>CHAPTER 11</p> <p>CASE NO.: 23-10764 MDC</p> <p>(Jointly Administered)</p>
---	--

**AMENDED HAWK INVESTMENT HOLDINGS LTD.’S  
WITNESS AND EXHIBIT LIST FOR DECEMBER 11, 2023 HEARINGS**

Hawk Investment Holdings Ltd. (“Hawk”) hereby gives notice that it may call the witnesses and offer the exhibits listed below as evidence at the hearing on the (a) *Application of the Debtors for Entry of an Order Authorizing the Debtors to Retain Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 298] (the “Park Application”) and (b) *Local Rule 2016-5 First Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period March 15, 2023, through April 30, 2023* [ECF No. 409] (the “Fee Application”), each scheduled for December 11, 2023 (the “Hearing”).

**WITNESSES**

1. Hawk may call the following witnesses at the Hearing: (i) Thomas Park, (ii) any witness listed by Debtors or any other party, and (iii) any witnesses necessary for impeachment and/or rebuttal purposes.

**EXHIBITS**

2. In addition to the below listed exhibits, Hawk also reserves the right to utilize any exhibit listed on Debtors' exhibit list, the exhibit list of any other party, or documents on the docket of the above-captioned or related matters. Hawk also reserves the right to utilize any document not listed below for impeachment and/or rebuttal purposes.

3. Exhibit 1 – *Disclosure of Compensation of Attorney for Debtor* [ECF No. 59].

4. Exhibit 2 – *Application Pursuant to 11 U.S.C. § 327(a) of the Bankruptcy Code for Authority to Employ Lewis Brisbois Bisgaard & Smith LLP as Counsel for the Debtors* [ECF No. 70].

5. Exhibit 3 – *Amended Disclosure of Compensation of Attorney or Debtor* [ECF No. 126]

6. Exhibit 4 – *Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay (I) Prepetition Employee Obligations, (II) Prepetition Withholding Obligations, and (III) Post-Petition Employee Obligations in the Ordinary Course* [ECF No. 134].

7. Exhibit 5 – *Debtors' Expedited Motion for Entry of Interim and Final Orders Authorizing Debtors to Take Certain Actions in the Ordinary Course of Business* [ECF No. 135].

8. Exhibit 6 – *Supplemental Declaration of Rafael X. Zahralddin-Aravena in Support of Debtors' Application to Employ Lewis Brisbois Bisgaard & Smith LLP as Counsel for the Debtors* [ECF No. 180].

9. Exhibit 7 – *Amended Monthly Operating Report* (Period Ending March 31, 2023) [ECF No. 223].

10. Exhibit 8 – *Monthly Operating Report* (Period Ending April 30, 2023) [ECF No. 224]

11. Exhibit 9 – *Monthly Operating Report* (Period Ending May 31, 2023) [ECF No. 253]

12. Exhibit 10 – *Disclosure Statement for Joint Plan of Reorganization of Stream TV Networks, Inc. and Technovative Media, Inc. Pursuant to Chapter 11 of the Bankruptcy Code* [ECF No. 293].

13. Exhibit 11 – *Monthly Operating Report* (Period Ending June 30, 2023) [ECF No. 300].

14. Exhibit 12 – *Declaration of Mathu Rajan in Support of Debtors’ Opposition to Hawk Investment Holdings Limited’s Supplement to Motion to Compel Discovery and Impose Sanctions for Failure to Comply (Docket No. 307)* [ECF No. 326].

15. Exhibit 13 - *Monthly Operating Report* (Period Ending July 31, 2023) [ECF No. 399].

16. Exhibit 14 – *Local Rule 2016-5 First Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period March 15, 2023, through April 30, 2023* [ECF No. 409].

17. Exhibit 15 – *Hawk Investment Holdings Ltd.’s Objection to Local Rule 2016-5 First Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period March 15, 2023, through April 30, 2023* [ECF No. 424].

18. Exhibit 16 – *Debtors’ Post-Trial Brief in (I) Opposition to Motion of Hawk Investment Holdings Ltd. Pursuant to Section 1112(b) of the Bankruptcy Code Either (A)(1) to Dismiss the Debtors’ Chapter 11 Cases or (2) to Convert Such Cases to Cases under Chapter 7 or, (B) in the Alternative, Pursuant to Section 1104(a) of the Bankruptcy Code to Appoint a*

*Chapter 11 Trustee; and (II) in Opposition to Emergency Motion for Relief from Stay Filed by Hawk Investment Holdings, Ltd.* [ECF No. 432].

19. Exhibit 17 – *Debtors’ Post-Trial Reply Brief* [ECF No. 437].

20. Exhibit 18 – *Response of the Debtors, Stream TV Networks, Inc., and Technovative Media, Inc. to Hawk Investment Holdings Ltd.’s Objection to Debtors’ First Fee Application* [ECF No. 446].

21. Exhibit 19 – *Second Supplemental Declaration of Rafael X. Zahralddin-Aravena in Support of Debtors’ Application to Employ Lewis Brisbois Bisgaard & Smith LLP as Counsel for the Debtors* [ECF No. 499].

22. Exhibit 20 – June 21, 2023 Deposition Transcript (Thomas Park), *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

23. Exhibit 21 – August 14, 2023 Deposition Transcript (Mathu Rajan), *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

24. Exhibit 22 – April 24, 2023 Hearing Transcript, *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

25. Exhibit 23 – June 29, 2023 Hearing Transcript, *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

26. Exhibit 24 – August 17, 2023 Hearing Transcript, *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

27. Exhibit 25 – September 25, 2023 Hearing Transcript, *In re Stream TV Networks, Inc.*, No. 23-10764 (Bankr. E.D. Pa.).

28. Exhibit 26 – OMITTED.

29. Exhibit 27 – *Motion of the Debtors for Entry of an Order Authorizing the Debtors to Enter into an Employment Agreement with Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 234].

30. Exhibit 28 – *Hawk Investment Holdings Ltd. 's Objection and Reservation of Rights to Motion of the Debtors to Enter into an Employment Agreement with Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 285].

31. Exhibit 29 – *Application of Debtors for Entry of an Order Authorizing the Debtors to Retain Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 298].

32. Exhibit 30 – *Hawk Investment Holdings Ltd. 's Objection to the Application of Debtors for Entry of an Order Authorizing the Debtors to Retain Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 306].

33. Exhibit 31 – *Supplemental Declaration of Thomas Jung Ho Park in Support of Application of Debtors for Entry of an Order Authorizing the Debtors to Retain Thomas Jung Ho Park as Chief Financial Officer to the Debtors* [ECF No. 416].

34. Exhibit 32 – *Monthly Operating Report* (Period ending September 30, 2023) [ECF No. 460].

35. Exhibit 33 – *Supplement of Stream TV Networks, Inc. 's Monthly Operating Reports for the Months of August and September 2023* [ECF No. 463].

### **RESERVATION OF RIGHTS**

Hawk reserves the right to amend and/or supplement this witness and exhibit list prior to the Hearing. Hawk further reserves the right to introduce (i) any exhibit designated by another party or (ii) any exhibit necessary for impeachment and/or rebuttal purposes.

Dated: December 8, 2023

**K&L GATES LLP**

/s/ Steven L. Caponi

Steven L. Caponi, Esq. (No. 91881)  
K&L Gates LLP  
600 King Street, Suite 901  
Wilmington, DE 19801  
Telephone: (302) 416-7000  
Facsimile: (302) 416-7020  
Email: steven.caponi@klgates.com

- and -

Margaret R. Westbrook, Esq.  
Aaron S. Rothman, Esq.  
Jonathan Noble Edel, Esq.  
K&L Gates LLP  
300 South Tryon Street, Suite 1000  
Charlotte, NC 28202  
Telephone: (704) 331-7400  
Email: margaret.westbrook@klgates.com  
aaron.rothman@klgates.com  
jon.edel@klgates.com

*Attorneys for Hawk Investment Holdings Ltd.*